

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EMOJI COMPANY GmbH,)	
)	
)	Case No. 22-cv-6862
Plaintiff,)	
)	
v.)	
)	Hon. Steven C. Seeger
THE INDIVIDUALS, CORPORATIONS,)	
LIMITED LIABILITY COMPANIES,)	
PARTNERSHIPS, AND UNINCORPORATED)	
ASSOCIATIONS IDENTIFIED ON)	
SCHEDULE A HERETO,)	
)	
)	
Defendants.)	

**PLAINTIFF’S *EX-PARTE* MOTION TO
EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65(b)(2), Plaintiff EMOJI COMPANY GmbH seeks to extend the Temporary Restraining Order entered by the Court on August 14, 2023 [Dkt. 28, 27] (“the TRO”) which is set to expire on August 28, 2023, for a period of fourteen (14) days to and including September 11, 2023.

Since entry of the TRO, Plaintiff has been working to ensure compliance with its terms by third parties. In particular, Plaintiff promptly subpoenaed information concerning the identities of defendants from third parties including Amazon, eBay, PayPal and Walmart, which are in the process of complying. Plaintiff respectfully requests the Court to extend the TRO to provide additional time for Amazon, eBay, PayPal and Walmart to comply with the terms thereof.

Plaintiff submits that good cause exists for extending the TRO to prevent Defendants from transferring assets from their U.S.-based financial accounts, modifying the names of their internet stores, or removing their internet stores from their current platform, among other things, as outlined in Plaintiff's Memorandum in Support of *Ex Parte* Motion for a Temporary Restraining Order [Dkt. 11]. This probability of harm is significant and continuing.

Wherefore, Plaintiff requests that the TRO be extended for a period of fourteen (14) days to and including September 11, 2023.

Respectfully submitted,

Dated: August 24, 2023

By: s/ Michael A. Hierl
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Plaintiff's *Ex-Parte* Motion to Extend the Temporary Restraining Order was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on August 24, 2023.

s/Michael A. Hierl